

**Steven J. Moser**

Tel: 631-824-0200

steven.moser@moserlawfirm.com

MOSER LAW FIRM, PC



June 28, 2024

**VIA ECF**

Hon. Lee G Dunst, USMJ  
United States District Court Eastern District of New York  
100 Federal Plaza, Courtroom 830  
Central Islip, NY 11722

Re: *Barahona et al v Paradise Tree Service & Landscape, Corp et al*,  
Case No. 21-cv-05400 (GRB)(AYS)

Dear Judge Dunst:

I represent the Plaintiffs in the above referenced action. Please accept this status report. As of the date hereof the Defendants have declined to furnish documents evidencing an inability to pay and the parties remain at an impasse in settlement negotiations.

Plaintiffs respectfully request that the Court direct the parties to submit a revised joint pretrial order by a date certain.

Respectfully Submitted,

*Steven J. Moser*

Steven J. Moser

CC: William Nieto (Via Email)